

Fill in this information to identify your case:

United States Bankruptcy Court for the:

WESTERN DISTRICT OF NEW YORK

Case number (if known) Chapter 7

☐ Check if this an amended filing

Official Form 201

Voluntary Petition for Non-Individuals Filing for Bankruptcy

06/22

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and the case number (if known). For more information, a separate document, *Instructions for Bankruptcy Forms for Non-Individuals*, is available.

1. Debtor's name Blue Ocean Partners LLC

2. All other names debtor used in the last 8 years  
Include any assumed names, trade names and doing business as names  
DBA Plaintiff Support Services

3. Debtor's federal Employer Identification Number (EIN) 20-2318626

4. Debtor's address Principal place of business Mailing address, if different from principal place of business

c/o 5933 Main Street  
Apartment 204  
Williamsville, NY 14221

Number, Street, City, State & ZIP Code

Erie  
County

P.O. Box, Number, Street, City, State & ZIP Code

Location of principal assets, if different from principal place of business

Number, Street, City, State & ZIP Code

5. Debtor's website (URL)

6. Type of debtor  
☒ Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP))  
☐ Partnership (excluding LLP)  
☐ Other. Specify:

7. Describe debtor's business

A. Check one:

- ☐ Health Care Business (as defined in 11 U.S.C. § 101(27A))  
☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))  
☐ Railroad (as defined in 11 U.S.C. § 101(44))  
☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))  
☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))  
☐ Clearing Bank (as defined in 11 U.S.C. § 781(3))  
☒ None of the above

B. Check all that apply

- ☐ Tax-exempt entity (as described in 26 U.S.C. §501)  
☐ Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. §80a-3)  
☐ Investment advisor (as defined in 15 U.S.C. §80b-2(a)(11))

C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor. See <http://www.uscourts.gov/four-digit-national-association-naics-codes>.

5239

8. Under which chapter of the Bankruptcy Code is the debtor filing?

Check one:

☒ Chapter 7

☐ Chapter 9

☐ Chapter 11. Check **all** that apply:

- ☐ The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D), and its aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$3,024,725. If this sub-box is selected, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if any of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
- ☐ The debtor is a debtor as defined in 11 U.S.C. § 1182(1), its aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$7,500,000, **and it chooses to proceed under Subchapter V of Chapter 11**. If this sub-box is selected, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return, or if any of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
- ☐ A plan is being filed with this petition.
- ☐ Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).
- ☐ The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the *Attachment to Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11* (Official Form 201A) with this form.
- ☐ The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.

☐ Chapter 12

9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years?

☒ No.

☐ Yes.

If more than 2 cases, attach a separate list.

District

When

Case number

District

When

Case number

10. Are any bankruptcy cases pending or being filed by a business partner or an affiliate of the debtor? ☒ No ☐ Yes.

List all cases. If more than 1, attach a separate list

Debtor Relationship  
District \_\_\_\_\_ When \_\_\_\_\_ Case number, if known \_\_\_\_\_

11. Why is the case filed in this district? Check all that apply:
- ☒ Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.
- ☐ A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

12. Does the debtor own or have possession of any real property or personal property that needs immediate attention? ☒ No ☐ Yes. Answer below for each property that needs immediate attention. Attach additional sheets if needed.
- Why does the property need immediate attention? (Check all that apply.)**
- ☐ It poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety.  
What is the hazard? \_\_\_\_\_
- ☐ It needs to be physically secured or protected from the weather.
- ☐ It includes perishable goods or assets that could quickly deteriorate or lose value without attention (for example, livestock, seasonal goods, meat, dairy, produce, or securities-related assets or other options).
- ☐ Other \_\_\_\_\_
- Where is the property?** \_\_\_\_\_  
Number, Street, City, State & ZIP Code
- Is the property insured?**
- ☐ No
- ☐ Yes. Insurance agency \_\_\_\_\_  
Contact name \_\_\_\_\_  
Phone \_\_\_\_\_

### Statistical and administrative information

13. Debtor's estimation of available funds. Check one:
- ☐ Funds will be available for distribution to unsecured creditors.
- ☒ After any administrative expenses are paid, no funds will be available to unsecured creditors.

14. Estimated number of creditors
- |   |  |  |
|---|--|--|
| <input type="checkbox"/> 1-49             | <input type="checkbox"/> 1,000-5,000   | <input type="checkbox"/> 25,001-50,000     |
| <input checked="" type="checkbox"/> 50-99 | <input type="checkbox"/> 5001-10,000   | <input type="checkbox"/> 50,001-100,000    |
| <input type="checkbox"/> 100-199          | <input type="checkbox"/> 10,001-25,000 | <input type="checkbox"/> More than 100,000 |
| <input type="checkbox"/> 200-999          |  |  |

15. Estimated Assets
- |  |  |  |
|--|--|--|
| <input type="checkbox"/> \$0 - \$50,000          | <input checked="" type="checkbox"/> \$1,000,001 - \$10 million | <input type="checkbox"/> \$500,000,001 - \$1 billion     |
| <input type="checkbox"/> \$50,001 - \$100,000    | <input type="checkbox"/> \$10,000,001 - \$50 million           | <input type="checkbox"/> \$1,000,000,001 - \$10 billion  |
| <input type="checkbox"/> \$100,001 - \$500,000   | <input type="checkbox"/> \$50,000,001 - \$100 million          | <input type="checkbox"/> \$10,000,000,001 - \$50 billion |
| <input type="checkbox"/> \$500,001 - \$1 million | <input type="checkbox"/> \$100,000,001 - \$500 million         | <input type="checkbox"/> More than \$50 billion          |

16. Estimated liabilities
- |   |   |  |
|---|---|--|
| <input type="checkbox"/> \$0 - \$50,000 | <input type="checkbox"/> \$1,000,001 - \$10 million | <input type="checkbox"/> \$500,000,001 - \$1 billion |
|---|---|--|

Debtor

Blue Ocean Partners LLC

Name

Case number (if known)

☐ \$50,001 - \$100,000

☐ \$100,001 - \$500,000

☐ \$500,001 - \$1 million

☒ \$10,000,001 - \$50 million

☐ \$50,000,001 - \$100 million

☐ \$100,000,001 - \$500 million

☐ \$1,000,000,001 - \$10 billion

☐ \$10,000,000,001 - \$50 billion

☐ More than \$50 billion

**Request for Relief, Declaration, and Signatures**

**WARNING --** Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

**17. Declaration and signature  
of authorized  
representative of debtor**

The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.

I have been authorized to file this petition on behalf of the debtor.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on **March 22, 2023**  
MM / DD / YYYY

**X /s/ Joseph DiNardo**  
Signature of authorized representative of debtor  
  
Title **Managing Member**

**Joseph DiNardo**  
Printed name

**18. Signature of attorney**

**X /s/ Daniel F. Brown**  
Signature of attorney for debtor

Date **March 22, 2023**  
MM / DD / YYYY

**Daniel F. Brown**  
Printed name

**Andreozzi Bluestein LLP**  
Firm name

**9145 Main Street  
Clarence, NY 14031**  
Number, Street, City, State & ZIP Code

Contact phone **(716) 633-3200** Email address \_\_\_\_\_

\_\_\_\_\_  
Bar number and State

**WRITTEN CONSENT OF**  
**THE MEMBERS OF**  
**BLUE OCEAN PARTNERS LLC**

THE UNDERSIGNED, being all of the Members of Blue Ocean Partners LLC, a New York limited liability company (the "Company" or "Blue Ocean"), who would be entitled to notice of a meeting of the members of the Company for purposes of taking such action and adopting the resolutions set forth below, do hereby waive such notice, take the following actions and adopt the following resolutions by written consent, pursuant to Section 407 of the New York Limited Liability Company Law:

WHEREAS, as a result of business disputes and pending litigation, Blue Ocean currently lacks access to sufficient capital to enable it to either operate in the ordinary course of business or to defend itself against pending litigation; and




WHEREAS, it is believed that the filing of a Chapter 7 bankruptcy petition by Blue Ocean is in the best interests of both the creditors and members of Blue Ocean because it represents the best currently available opportunity to preserve for its creditors and members at least some portion of the value of the Funding Agreements and Opportunities which were originated by Blue Ocean.

NOW, THEREFORE, BE IT

RESOLVED, that the members of the Company hereby authorize the filing of a Chapter 7 bankruptcy petition by Blue Ocean in the United States Bankruptcy Court for the Western District of New York, pursuant to the United States Bankruptcy Code, 11 U.S.C. §101, *et seq.*; and it is

RESOLVED FURTHER, that Joseph D. DiNardo is hereby authorized to take all steps reasonable, necessary and prudent to assist and accomplish that goal.

IN WITNESS WHEREOF, the undersigned have executed this Consent, which may be signed in one or more counterparts, which taken together shall constitute one document, as of this \_\_\_\_ day of March, 2023.

Agreed (Initial)	Date	
JD	3/20/23	 D & D Funding LLC, Member
LD	3/22/23	 Plaintiff Support Services, LLC, Member
		 Myron Robbins, Member

**United States Bankruptcy Court  
Western District of New York**

In re **Blue Ocean Partners LLC**

Debtor(s)

Case No. \_\_\_\_\_

Chapter

**7**

**VERIFICATION OF CREDITOR MATRIX**

I, the Managing Member of the corporation named as the debtor in this case, hereby verify that the attached list of creditors is true and correct to the best of my knowledge.

Date: **March 22, 2023**

**/s/ Joseph DiNardo**

**Joseph DiNardo/Managing Member**

Signer/Title

Albert Pascuzzi  
223 N. Bayshore Drive  
Columbiana, OH 44408

Alexandra Panek  
34 Ithica Street  
Waverly, NY 14892

American Express  
Post Office Box 981535  
El Paso, TX 79998

Anastasi Trucking, Inc.  
Attn: Gary Anastasi  
4430 Walden Avenue  
Lancaster, NY 14086

Arlene Lindow  
81 Blossom Wood Lane  
Cheektowaga, NY 14227

Blake Henderson  
10145 Mueller Court  
Niagara Falls, NY 14304

Candace Caprow  
120 Fordham Drive  
Buffalo, NY 14216

Candace Polowitz  
f/b/o Matthew Polowitz  
120 Fordham Drive  
Buffalo, NY 14216

Cartiga  
400 Park Avenue  
New York, NY 10022

Cathy Bern  
Post Office Box 1495  
Aspen, CO 81612

Cheryl Slomka  
247 A. Miller Street  
Depew, NY 14043



Chester Wyche  
34 Guy Lane  
West Cossackie, NY 12192

Christina Panek Rynone  
f/b/o William Panek Rynone  
1139 Walker Hill Road  
Waverly, NY 14892

Christina Panek Rynone  
1139 Walker Hill Road  
Waverly, NY 14892

Christina Panek Rynone  
f/b/o Thomas Panek Rynone  
1139 Walker Hill Road  
Waverly, NY 14892

Clifford B. Katzenelson  
63 Pietro Drive  
Yonkers, NY 10710-2009

Clifford Hyman  
1103 Carriage Hill Road  
Melbourne, FL 32940

Counsel Financial Services, LLC  
6400 Main Street, Suite 100  
Williamsville, NY 14221

CT Corporation System  
Attn: GM  
28 Liberty Street, 42nd Floor  
New York, NY 10005

D&D Funding, LLC  
1760 Hillmont  
Nashville, TN 37215-2902

Dansa D'Arata & Soucia CPAs LLP  
500 Pearl Street, Suite 810  
Buffalo, NY 14202

Dean Chase  
c/o Woods Oviatt Gilman LLP  
Attn: Brian D. Gwitt, Esq.  
1900 Main Place Tower  
Buffalo, NY 14202

Diane Sarsfield  
514 Daniels Street #406  
Raleigh, NC 27605-1317

FedEx Corp. Revenue Services  
3965 Airways, Module G  
Memphis, TN 38116

Friedman, Kaplan, Seiler & Adelman, LLP  
Attn: Geoffrey Cajigas, Esq.  
7 Times Square  
New York, NY 10036

Friedman, Kaplan, Seiler & Adelman, LLP  
Attn: Eric Jonathan Seiler, Esq.  
7 Times Square  
New York, NY 10036

Gary R. Anastasi  
4430 Walden Avenue  
Lancaster, NY 14086

Gerald Rice  
81 Blossom Wood Lane  
Cheektowaga, NY 14227

Harvey Hirschfeld  
612 Edge Creek Drive  
Myrtle Beach, SC 29579

Hodgson Russ LLP  
The Guaranty Building  
140 Pearl Street, Suite 100  
Buffalo, NY 14202-4040

Horst & Maria Hermanski  
9618 West Cottonwood Drive  
Sun City, AZ 85373

i/n/o Residuary Trust u/w Richard Anasta  
Attn: Joan Anastasi, Trustee  
11298 Main Street  
Clarence, NY 14031

Internal Revenue Service  
Centralized Insolvency Operations  
Post Office Box 7346  
Philadelphia, PA 19101-7346

Jasyn Polowitz  
120 Fordham Drive  
Buffalo, NY 14216

Jeff Bowers  
612 Hawbrook  
St. Louis, MO 63122

Jessica Hallick  
Buffalo Ledgers LLC  
8479 Sisson Highway  
Eden, NY 14057

Joan Anastasi  
11298 Main Street  
Clarence, NY 14031

John Panek  
34 Ithica Street  
Waverly, NY 14892

Joseph DiNardo  
5933 Main Street  
Apartment 204  
Williamsville, NY 14221

Joseph DiNardo 2005 Trust  
5933 Main Street  
Apartment 204  
Williamsville, NY 14221

Joshua DiNardo  
276 Parker Avenue  
Buffalo, NY 14214

Kelly & Timothy Hacker  
5848 Ainslee Lane  
Lake View, NY 14085

Lincoln Archives, Inc.  
155 Great Arrow Avenue  
Buffalo, NY 14207

Louise English  
7703 Mykolaitis Lane  
Schenectady, NY 12303

Marisa Polowitz  
120 Fordham Drive  
Buffalo, NY 14216

Mark Wickenhiser  
9730 Greiner Road  
Clarence, NY 14031

Martin & Christine Frascella  
224 West Shore Road  
Cuba, NY 14727

Micronet Inc.  
Post Office Box 51186  
Salt Lake City, UT 84157

Mona A. Bachman  
11293 Main Street  
Clarence, NY 14031

Montague Partners VI LLC  
26 Court Street  
Brooklyn, NY 11242

Northwest Bank  
100 Liberty Street  
Post Office Box 786  
Warren, PA 16365

NYS Department of Labor  
Attn: Insolvency Unit  
Harriman State Office Campus  
Building 12, Room 256  
Albany, NY 12240

NYS Department of Taxation & Finance  
Bankruptcy Unit  
Post Office Box 5300  
Albany, NY 12205

Plaintiff Funding Holding, LLC  
d/b/a LawCash  
Attn: Patrick Preece  
6 Commerce Drive  
Cranford, NJ 07016

Plaintiff Investment Funding, LLC  
c/o Jaffe, Raitt, Heuer & Weiss, P.C.  
Attn: David Z. Adler, Esq.  
27777 Franklin Road  
Southfield, MI 48034

Plaintiff Support Funding, LLC  
c/o Taylor English Duma LLP  
Attn: Michael S. Melfi, Esq.  
1600 Parkwood Circle, Suite 200  
Atlanta, GA 30339

Plaintiff Support Services, LLC  
c/o 5933 Main Street  
Apartment 204  
Williamsville, NY 14221

Plaintiff Support Services, LLC  
6400 Main Street, Suite 120  
Williamsville, NY 14221

Richard & Kathy Hilliman  
748 Columbus Parkway  
Buffalo, NY 14213

Richard D. Anastasi  
6219 Genesee St.  
Lancaster, NY 14086

Ronald and Nancy McDermott  
3393 Long Shadow Drive  
Baldwinsville, NY 13027

Ronald Schuit  
and Cora Ann Schuit Revocable Trust  
759 Sawgrass Bridge Road  
Venice, FL 34292

Rose Wickenhiser  
8310 Clarnew Drive  
East Amherst, NY 14051

Scott Gildea  
711 Ashland Street  
Houston, TX 77007

ShelterPoint Life Insurance Company  
Post Office Box 9340  
Garden City, NY 11530

Shirley Polowitz  
52 Garrett Street  
609B Riverview Towers  
Pittsburgh, PA 15217

Steven Polowitz  
120 Fordham Drive  
Buffalo, NY 14216

The DiNardo Law Firm 401K Profit Sharing  
c/o 5933 Main Street  
Apartment 204  
Williamsville, NY 14221

The DiNardo Law Firm P.C. Profit Sharing  
FBO Joseph DiNardo  
c/o 5933 Main Street  
Apartment 204  
Williamsville, NY 14221

The DiNardo Law Firm, P.C.  
c/o 5933 Main Street  
Apartment 204  
Williamsville, NY 14221

The Marie Paolini Trust  
Attn: Joseph DiNardo, Trustee  
5933 Main Street  
Apartment 204  
Williamsville, NY 14221

The Schimmel Revocable of 2013  
5 Heritage Way  
Exeter, NH 03833

Transworld Systems Inc.  
Post Office Box 15520  
Wilmington, DE 19850-5520

Valerian & Loretta Derenda  
32 Girard Avenue  
Cheektowaga, NY 14227

Vaughn & Marcia Becker  
601 Columbia Avenue  
Lancaster, NY 14086

Verizon  
Attn: Bankruptcy Department  
500 Technology Drive, Suite 550  
Saint Charles, MO 63304

Warren Fargo  
341 South Center Street  
Corry, PA 16407-1936

ZipWhip  
300 Elliott Avenue W, Suite 500  
Seattle, WA 98119

Zthernet LLC  
1333 Corporate Drive, Suite 240  
Irving, TX 75038

**United States Bankruptcy Court  
Western District of New York**

In re **Blue Ocean Partners LLC**

Debtor(s)

Case No.  
Chapter

**7**

**CORPORATE OWNERSHIP STATEMENT (RULE 7007.1)**

Pursuant to Federal Rule of Bankruptcy Procedure 7007.1 and to enable the Judges to evaluate possible disqualification or recusal, the undersigned counsel for **Blue Ocean Partners LLC** in the above captioned action, certifies that the following is a (are) corporation(s), other than the debtor or a governmental unit, that directly or indirectly own(s) 10% or more of any class of the corporation's(s') equity interests, or states that there are no entities to report under FRBP 7007.1:

**D&D Funding, LLC**  
**1760 Hillmont**  
**Nashville, TN 37215-2902**

**Plaintiff Support Services, LLC**  
**c/o 5933 Main Street**  
**Apartment 204**  
**Williamsville, NY 14221**

☐ None [*Check if applicable*]

**March 22, 2023**

Date

**/s/ Daniel F. Brown**

**Daniel F. Brown**

Signature of Attorney or Litigant

Counsel for **Blue Ocean Partners LLC**

**Andreozzi Bluestein LLP**

**9145 Main Street**

**Clarence, NY 14031**

**(716) 633-3200 Fax:(716) 633-0301**